



City of Newark, Department of Engineering  
Uniform Construction Code  
920 Mayor Kenneth A. Gibson Blvd., Room B23  
Newark, NJ 07102  
(973) 733-5632

May 5, 2025

**Via Electronic Mail and Certified Mail**

Delaney Hall, Geo Group  
c/o Esker Lee Tatum  
451-479 Doremus Avenue  
Newark, New Jersey 07105

**Re: Initial Visual Inspections at Delaney Hall – Supplemental Report**

Dear Esker Lee Tatum:

This supplemental report is being submitted to provide additional clarifications regarding the findings outlined in the initial visual inspection report conducted by the City of Newark Uniform Construction Code (Building Department) at the above referenced property.

The original report, dated April 30, 2025, summarized the observations made during the inspection of Delaney Hall. To ensure full transparency and to address any ambiguities or questions arising from the initial findings, the following clarifications are provided in **Bold**:

Building:

- The newly installed front entry gate will need a permit. **Violation for working without a permit was issued. In accordance to UCC 5:23-2.14, this work would require a permit.**
- Door closer are required for doorways leading to hallways, stairwell, and gym area.
- Observed large penetrations in the mechanical room where the water heaters and storage tanks are located. **This requirement needs to be in compliance with 2000 IBC New Jersey Edition Sections: 708, 711, and 712.**
- Safety issues Fireratings **Refer to listed codes in previous bullet**

Electrical:

- Laundry are needs to have Disconnect switches installed for each hardwired machine
- Conduits feeding the washing machines need to be secured
- GFCI outlets are needed in the following areas:
  - Gym bathroom
  - M106
  - H214
  - Drinking fountain(s) in the hallway

- H511
- Utility Room
- **This requirement needs to be in compliance with 2005 NEC article 210.8**
- Staff bathroom hand dryers has no power
- Entry gate will need a permit for the electrical work related to this installation. The work will need to be exposed to ensure that the work was done in accordance with Electrical Building Codes or a signed and sealed letter by a licensed electrical engineer in the state of NJ will need to be provided certifying that the work was done in accordance with the code. **Violation for working without a permit was issued. In accordance to UCC 5:23-2.14, this work would require a permit.**
- Safety concerns, Shock hazard close to water source. **Refer to listed code under GFCI bullet above under this section.**
- Burial depth for underground conduits for electric gate openers.
- Correct wiring for gates.

Fire:

- During the walk-through the inspector was provided the following: Fire Sprinklers Maintenance report, Fire Alarm Maintenance report and maintenance and service report for kitchen exhaust hood and as well as the kitchen fire suppression system.
- All fire extinguishers were serviced and tagged well within the yearly necessary service period.
- All exit signs were in place and found to be in working order.
- Self-closing devices need to be added at exit doors at stairways.
- The building as it is in compliance under the applicable code related to the last mayor addition in 2007. But the following was recommended, but not code required: Bluetooth CO detectors to common areas on the second floor (currently battery-powered are installed and acceptable), replacing pendant type fire sprinkler heads in the bunk rooms with recessed type (to deter potential vandalism).
- Safety issues Clear exit discharge, Make sure extinguisher are charged and up to date. Fire ratings. **Requirements for Clear Exit Discharge, needs to be in compliance with Chapter 10 in the 2000 IBC NJ Edition Section for "Exit Discharge". Fire Rating is covered under the listed codes under the Building Section above.**

Plumbing:

- All dryers on the first floor will need gas valves, and no more than 6ft apart. **This requirement needs to be in compliance with 2003 IFGC 409.5.**
- Showers on the first floor need extraction fan.
- Gas appliances with wheels in the main kitchen, will need to be secured to protect gas connections. **This requirement needs to be in compliance with 2003 IFGC 411.1.3.** Also in same space, the mop sink needs a faucet that has a vacuum breaker. **This requirement needs to be in compliance with 2003 NSPC 7.18.1.**
- Sink in the water heater room needs to have the waste pipe fixed and cap waste pipe underneath.

- On Wing #2, at second floor, water fountain does not dispense water.
  - On Wing #5, barbershop room 511, a new sink was installed. This appears to have been taken by reducing the bathroom next door. This work will require a permit.
  - Batteries for automatic faucets need to be replaced (where applicable).
  - Domestic water meter # is 80714717 and Fire meter #is 86643713.
  - Safety issues Potable water cross contamination, emergency gas shut offs, restraining cables to protect gas connectors, Open pipes allowing sewer gas into the building.
- Requirements for Potable Water Cross Contamination, needs to be in compliance with Chapter 10 "Water Supply and Distribution Systems" in the 2003 NSPC. Other safety issues have been address in bullets above under this section.**

Elevator:

- Two (2) hydraulic elevators were observed. Their registration # is 0714-00921
- Fire service along with alarm systems and were found to be operating normal.
- The units received a pre-inspection on 2.28.25 and are being maintained by Frank and Sons Dynamic Elevator.
- The Elevator are ready for their annual inspection and property management was advised to have the Elevator maintenance company call the Elevator inspector to coordinate the annual inspection. **This requirement needs to be in compliance with UCC 5:23-12.3 and in accordance with ASME A17.1.**
- **Must provide a current Certificate of Compliance. This is in accordance to UCC 5:23-12.9 and required by City of Newark Fire Prevention.**

Some of the items listed above are maintenance items, which do not need a building permit. Those which require a building permit have been identified. In addition to the above, a CO application will be required to be submitted to the building department and a CO inspection will be required. Due to the increase of occupancy to 1000 beds, therefore this would require a new CO. Also, a code analysis will need to be prepared by a licensed design professional showing the following but not limited to occupancy load, means of egress, use group (old vs. new), and any other information pertinent to a complete code analysis. The facility will not be able to open until a new CO is issued by the UCC office.

**Certificate of Continued Occupancy (CCO) or Certificate of Occupancy (Co):**

**Based on media accounts and public information regarding the proposed operation of the facility, it appears that a Certificate of Continued Occupancy (CCO) or a Certificate of Occupancy (CO) may be required. Upon a formal application for either a CCO or CO, the Building Department will make a definitive determination at that time.**

**If the facility is housing not just males, but also females and children, it will need to comply with the 2021 National Standard Plumbing Code (NSPC) New Jersey Edition for plumbing fixture requirements. Additionally, Section 308 of the 2021 International Building Code (IBC) New Jersey Edition outlines requirements for facilities housing children**

**, including provisions for safety, accessibility, and appropriate accommodations. Compliance with these requirements is essential to ensure the well-being of children in such facilities.**

UCC Building Department

Raymond Concepcion  
Assistant Director, Department of Engineering

A handwritten signature in blue ink, appearing to read 'RPC', is written over a horizontal line.

Name